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19          Classes*

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44           UNITED STATES DISTRICT COURT  
45           NORTHERN DISTRICT OF CALIFORNIA  
46           SAN FRANCISCO DIVISION

47          MAXIMILIAN KLEIN, et al.,

48           Plaintiffs,

49           vs.

50          META PLATFORMS, INC.,

51           Defendant.

52          Case No. 3:20-cv-08570-JD

53           **DECLARATION OF KATHERINE  
54           LOOPER IN SUPPORT OF ADVERTISER  
55           PLAINTIFFS' MOTION FOR CLASS  
56           CERTIFICATION**

57          DATE: December 14, 2023  
58          TIME: 10:00 a.m.  
59          DEPT. 11, 19th Floor  
60          Hon. James Donato

1 I, Katherine Looper, declare and state as follows:

2 1. I am a named Advertiser Plaintiff in the above-captioned litigation.

3 2. I am a citizen and resident of San Francisco, California.

4 3. I am over the age of 18, am personally familiar with, and have personal knowledge  
5 of the facts contained herein, which I could and would testify competently thereto.

6 4. I am aware that this class action lawsuit is brought on behalf of Facebook Inc.  
7 (“Facebook”) advertisers that have been wronged between December 1, 2016, and December 31,  
8 2020.

9 5. Between December 1, 2016, and December 31, 2020, I purchased advertising from  
10 Facebook in 34 different transactions, spending \$996.19—\$332.30 through my credit cards and  
11 \$663.89 through my PayPal account—to do so.

12 6. Between October 1, 2013, and November 30, 2016, I bought advertising from  
13 Facebook in 23 different transactions, paying \$615.59 through my PayPal account. I understand that  
14 these purchases are not within the Class Period proposed for this case.

15 7. On January 31, 2017, I bought advertising from Facebook in a transaction in the  
16 amount of \$33.87, paid through my PayPal account.

17 8. On February 28, 2017, I bought advertising from Facebook in a transaction in the  
18 amount of \$6.13, paid through my PayPal account.

19 9. On March 31, 2017, I bought advertising from Facebook in a transaction in the  
20 amount of \$62.70, paid through my PayPal account.

21 10. On April 30, 2017, I bought advertising from Facebook in a transaction in the amount  
22 of \$19.31, paid through my PayPal account.

23 11. On May 31, 2017, I bought advertising from Facebook in a transaction in the amount  
24 of \$21.88, paid through my PayPal account.

25 12. On June 30, 2017, I bought advertising from Facebook in a transaction in the amount  
26 of \$9.41, paid through my PayPal account.

27 13. On July 31, 2017, I bought advertising from Facebook in a transaction in the amount  
28 of \$20.59, paid through my PayPal account.

1       14. On August 31, 2017, I bought advertising from Facebook in a transaction in the  
2 amount of \$84.00, paid through my PayPal account.

3       15. On September 30, 2017, I bought advertising from Facebook in a transaction in the  
4 amount of \$19.00, paid through my PayPal account.

5       16. On November 30, 2017, I bought advertising from Facebook in a transaction in the  
6 amount of \$41.12, paid through my PayPal account.

7       17. On February 28, 2018, I bought advertising from Facebook in a transaction in the  
8 amount of \$30.04, paid through my PayPal account.

9       18. On March 31, 2018, I bought advertising from Facebook in a transaction in the amount  
10 amount of \$9.96, paid through my PayPal account.

11       19. On May 31, 2018, I bought advertising from Facebook in a transaction in the amount  
12 of \$20.17, paid through my Visa card ending in -1914.

13       20. On June 30, 2018, I bought advertising from Facebook in a transaction in the amount  
14 of \$27.83, paid through my Visa card ending in -1914.

15       21. On July 31, 2018, I bought advertising from Facebook in a transaction in the amount  
16 of \$46.24, paid through my Visa card ending in -1914.

17       22. On July 31, 2018, I bought advertising from Facebook in a transaction in the amount  
18 of \$36.75, paid through my Visa card ending in -1914.

19       23. On September 30, 2018, I bought advertising from Facebook in a transaction in the  
20 amount of \$33.37, paid through my Visa card ending in -1914.

21       24. On October 31, 2018, I bought advertising from Facebook in a transaction in the  
22 amount of \$8.05, paid through my PayPal account.

23       25. On November 30, 2018, I bought advertising from Facebook in a transaction in the  
24 amount of \$26.95, paid through my PayPal account.

25       26. On December 31, 2018, I bought advertising from Facebook in a transaction in the  
26 amount of \$14.00, paid through my PayPal account.

27       27. On February 1, 2019, I bought advertising from Facebook in a transaction in the  
28 amount of \$2.88, paid through my PayPal account.

1       28. On February 28, 2019, I bought advertising from Facebook in a transaction in the  
2 amount of \$17.12, paid through my Visa card ending in -1737.

3       29. On March 31, 2019, I bought advertising from Facebook in a transaction in the  
4 amount of \$30.00, paid through my Visa card ending in -1737.

5       30. On April 30, 2019, I bought advertising from Facebook in a transaction in the amount  
6 of \$60.82, paid through my Visa card ending in -1737.

7       31. On May 31, 2019, I bought advertising from Facebook in a transaction in the amount  
8 of \$55.00, paid through my PayPal account.

9       32. On July 31, 2019, I bought advertising from Facebook in a transaction in the amount  
10 of \$30.00, paid through my Visa card ending in -2622.

11       33. On August 31, 2019, I bought advertising from Facebook in a transaction in the  
12 amount of \$30.00, paid through my Visa card ending in -2622.

13       34. On September 30, 2019, I bought advertising from Facebook in a transaction in the  
14 amount of \$36.32, paid through my PayPal account.

15       35. On October 31, 2019, I bought advertising from Facebook in a transaction in the  
16 amount of \$33.93, paid through my PayPal account.

17       36. On November 30, 2019, I bought advertising from Facebook in a transaction in the  
18 amount of \$33.32, paid through my PayPal account.

19       37. On December 31, 2019, I bought advertising from Facebook in a transaction in the  
20 amount of \$16.43, paid through my PayPal account.

21       38. On January 31, 2020, I bought advertising from Facebook in a transaction in the  
22 amount of \$47.00, paid through my PayPal account.

23       39. On February 29, 2020, I bought advertising from Facebook in a transaction in the  
24 amount of \$40.00, paid through my PayPal account.

25       40. On March 31, 2020, I bought advertising from Facebook in a transaction in the  
26 amount of \$22.00, paid through my PayPal account.

27       41. I understand that, by this motion for class certification, I am moving to be appointed  
28 class representative in this action and for my attorneys, Scott+Scott Attorneys at Law LLP and

1 Bathaee Dunne LLP, to be appointed class counsel. I understand that Advertiser Plaintiffs Mark  
2 Young; Jessyca Frederick; Affilious, Inc.; Mark Berney; and 406 Property Services, PLLC are also  
3 moving to be appointed as class representatives.

4       42. I understand that a class representative is a representative party who acts on behalf  
5 of other class members in directing the litigation and am willing to serve in this capacity alongside  
6 the Advertiser Plaintiffs.

7       43. I understand that, as a class representative, I have a duty to prosecute the case  
8 vigorously and in the best interests of all class members, which includes reviewing important filings  
9 with the Court, consulting with counsel during the course of the litigation, making recommendations  
10 as to whether or not to accept a particular settlement offer and testifying at deposition and trial if  
11 called upon to do so. I have already testified at deposition in this case.

12       44. To the best of my knowledge, I have no conflicts of interest with any class member  
13 that would prevent me from fairly and adequately representing the best interests of the class. I  
14 understand that my compensation in this case will be the same as any other class members except  
15 that I may, with Court approval, be reimbursed for my reasonable costs and expenses incurred as a  
16 result of my acting as class representative.

17

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed on \_\_\_\_\_, in San Francisco, California.

DocuSigned by:  
  
Katherine Looper  
2B5FDAA072D44